

Exhibit 11



From: Kristopher Davis kdavis@raklaw.com

Subject: Re: Headwater third-party subpoenas to Samsung (2:23-cv-00379-JRG-RSP, 2:23-cv-00397-JRG-RSP, and 2:23-cv-00352-JRG-RSP)

Date: March 11, 2025 at 9:06 AM

To: Steffen Lake lake@fr.com

Cc: Jason Wietholter jwietholter@raklaw.com, Ben Thompson BThompson@fr.com, Neil Rubin nrubin@raklaw.com, Erin Alper alper@fr.com, Tae Hong hong@fr.com, Thad Kodish TKodish@fr.com, Jared Hartzman hartzman@fr.com, Katie Prescott prescott@fr.com, headwater@raklaw.com

Steffen,

With respect to the source code, please let us know if the code becomes available for review prior to Friday, March 14. Otherwise, please let the office know to expect Dr. Wesel, Jason Wietholter, and myself on Friday.

Regards,
Kris

Kristopher Davis
Russ August & Kabat
12424 Wilshire Boulevard, 12th Floor
Los Angeles, CA 90025
(310) 826-7474
kdavis@raklaw.com

On Mar 7, 2025, at 6:11 AM, Steffen Lake <lake@fr.com> wrote:

Jason,

Please find attached SEC's response and objections to source code subpoena. We are in the process of readying the source code for review in the Fish & Richardson San Diego office, and we expect to be ready for your review on Friday, March 14. Samsung does not object to Dr. Wesel, Mr. Manheim, and/or Mr. De la Iglesia reviewing the code consistent with the practice in previous Headwater v. Samsung cases.

Samsung's witness will be available for deposition Wednesday, March 12 at 9:00 AM ET.

Regards,
Steffen Lake :: Associate :: Fish & Richardson P.C.

From: Jason Wietholter <jwietholter@raklaw.com>

Sent: Thursday, March 6, 2025 12:44 PM

To: Steffen Lake <lake@fr.com>

Cc: kdavis@raklaw.com; Ben Thompson <BThompson@fr.com>; nrubin@raklaw.com; Erin Alper <alper@fr.com>; Tae Hong <hong@fr.com>; Thad Kodish <TKodish@fr.com>; Jared Hartzman <hartzman@fr.com>; Katie Prescott <prescott@fr.com>; headwater@raklaw.com

Subject: Re: Headwater third-party subpoenas to Samsung (2:23-cv-00379-JRG-RSP, 2:23-cv-00397-JRG-RSP, and 2:23-cv-00352-JRG-RSP)

[This email originated outside of F&R.]

Steffen,

We are still awaiting Samsung's response to the email below, which follows our months-long correspondence and teleconferences about Headwater's subpoenas. Please provide the requested confirmations and information by noon CT tomorrow

Please provide the requested confirmations and information by noon CT tomorrow (3/7). If Samsung cannot, we intend to open a conference bridge tomorrow at 1:30 pm CT for a lead-and-local meet and confer, in anticipation of a motion to compel. If you prefer a different time to meet and confer, please let us know.

Dial-in: 424-334-0565

Regards,

Jason Wietholter

Russ, August & Kabat

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On Feb 25, 2025, at 8:37 PM, Jason Wietholter <jwietholter@raklaw.com> wrote:

Steffen,

Attached, please find the subpoena to SEC for the production of source code which you previously agreed Fish & Richardson will accept service of. Please confirm that Samsung will make that code available for inspection in Fish & Richardson's San Diego offices. Dr. Wesel, Mr. Manheim, and/or Mr. De la Iglesia may review that source code. Please immediately confirm the location of Samsung's source code, and that Samsung has no objection to any of these individuals reviewing Samsung's source code, consistent with Samsung's practice in previous Headwater cases.

With respect to the topic designations, as we have repeatedly stated, Headwater requires a witness to testify to all of the topics in Headwater's original subpoena. To the extent SEA does not have direct knowledge regarding Topics 4-10 because those are purportedly exclusively within the knowledge of SEC employees, please confirm that the SEA witness will be prepared to testify regarding SEA's document production and SEA's knowledge of those topics, including that SEC installs the SEC produced source code on the accused products, that the source code is not modified after SEC installs the code, and that SEA understands that the products operate in accordance with the source code. Please also immediately confirm the identity and availability of Samsung's witness for deposition.

<250225 Headwater Notice of Subpoena to Samsung.pdf>

Regards,

Jason Wietholter

Russ, August & Kabat

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*****<2025-03-06 SEC Obj Resp to HW Source Code
Subpoena.pdf>